

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

KENNETH WRIGHT, on his own behalf and  
on behalf of other similarly situated persons,

Plaintiff,

v.

LYFT, INC., a Delaware corporation,

Defendant.

Case No. 2:14-cv-00421-BJR

SUPPLEMENTAL DECLARATION OF  
DONALD W. HEYRICH IN SUPPORT OF  
PLAINTIFF'S MOTION FOR APPROVAL  
OF SERVICE AWARD AND  
ATTORNEYS' FEES AND COSTS

I, Donald W. Heyrich, declare as follows:

1. Attached as Exhibit A is an itemized list of the out-of-pocket case expenses incurred in this matter in the total amount of \$20,764.06. This exhibit was inadvertently omitted from my prior declaration, Docket No. 94.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 22, 2019, in Chicago, Illinois.

/s/ Donald W. Heyrich, WSBA #23091

Donald W. Heyrich, WSBA #23091

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**DECLARATION OF SERVICE**

I certify that on this date I filed the foregoing document via the ECF system which will serve a copy on the counsel listed below:

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Dated: February 22, 2019.

/s/ Donald W. Heyrich  
Donald W. Heyrich, WSBA #23091

# EXHIBIT A

## Wright et al. v. Lyft, Inc. Case No. 2:14-cv-00421-BJR Plaintiff's Out-of-Pocket Litigation Expenses

Date	Memo/Description	Amount	Vendor
06/24/2014	Meeting with defense counsel	\$13.03	BERNARDS RESTAURANT
07/03/2014	Meeting with A Kirby regarding motion to dismiss	\$51.98	Roxy's Deli
08/11/2014	Mediation fee	\$2,425.00	JAMS-LA
10/23/2014	Team meeting with potential settlement administrator	\$97.03	Millers Guild Restaurant
12/29/2014	Courthouse parking	\$4.12	SEATTLE 684-PARK
01/15/2015	Research TCPA settlements	\$24.00	Superior Court of Alameda
07/23/2015	Mediation fee	\$2,425.00	JAMS-LA
10/06/2015	Mediation parking	\$26.00	80474 - Union Square
10/20/2015	Meeting with defense counsel	\$16.01	Bernards Restaurant(V)
4/30/2017	LexisNexis Charges	\$6.00	Masters Law Group PLLC
6/15/2017	Document Retrieval Cost	\$47.10	Masters Law Group PLLC
6/20/2017	Transcription Fee	\$27.90	Masters Law Group PLLC
6/28/2017	LexisNexis Charges	\$6.40	Masters Law Group PLLC
6/30/2017	LexisNexis Charges	\$91.85	Masters Law Group PLLC
7/31/2017	LexisNexis Charges	\$16.01	Masters Law Group PLLC
08/01/2017	Westlaw charges	\$7.57	Thomson Reuters
08/03/2017	Printing brief of respondent on certified questions	\$8.62	Washington State Supreme Court
10/01/2017	WestLaw charges	\$14.48	Thomson Reuters
10/24/2017	Mediation travel	\$1.24	Expedia
10/25/2017	Mediation Fees	\$10,000.00	Phillips ADR Enterprises, Inc.
10/25/2017	Mediation travel	\$275.98	Priceline*Hotel Rooms
10/25/2017	Mediation travel	\$64.20	United Airlines
10/25/2017	Mediation travel	\$64.00	Spirit Airlines
10/25/2017	Mediation travel	\$97.19	Spirit Airlines
10/30/2017	Mediation travel	\$43.73	Uber
10/31/2017	LexisNexis Charges	\$53.57	Masters Law Group PLLC
10/31/2017	Meals - mediation travel	\$44.71	The Hub
10/31/2017	Mediation travel	\$69.98	Hotwire
10/31/2017	Mediation travel	\$105.97	Priceline
10/31/2017	Mediation transportation	\$22.54	Chevron
10/31/2017	FedEx	\$53.53	FEDEX
11/01/2017	Mediation transportation	\$37.30	Uber
11/01/2017	Meals - mediation travel	\$56.68	Grill Concepts
11/01/2017	Meals - mediation travel	\$26.73	Grill Concepts
11/02/2017	Printing Briefs	\$5.44	Washington State Supreme Court
11/02/2017	Mediation travel	\$7.00	Best Western
11/02/2017	K. Kalin mediation travel expenses	\$1,022.73	Stutheit Kalin LLC
11/20/2017	K. Masters travel for Supreme Court argument	\$230.20	Masters Law Group PLLC
11/21/2017	LexisNexis Charges	\$148.26	Masters Law Group PLLC
02/12/2018	Mediation fee	\$1,100.00	Phillips ADR Enterprises, Inc.
02/14/2018	2018/02/14, Legal Research-Docketbird Pacer Fees	\$52.25	Docketbird Pacer Fees
02/20/2018	2018/02/20, Legal Research-Docketbird Pacer Fees	\$20.35	Docketbird Pacer Fees
02/21/2018	2018/02/21, Legal Research-Docketbird Pacer Fees	\$20.46	Docketbird Pacer Fees
02/22/2018	2018/02/22, Legal Research-Docketbird Pacer Fees	\$18.27	Docketbird Pacer Fees
03/01/2018	2018/03/01, Legal Research-Docketbird Pacer Fees	\$18.07	Docketbird Pacer Fees
03/04/2018	2018/03/04, Legal Research-Docketbird Pacer Fees	\$18.27	Docketbird Pacer Fees
03/04/2018	2018/03/04, Legal Research-Docketbird Pacer Fees	\$22.33	Docketbird Pacer Fees
03/08/2018	2018/03/08, Legal Research-Docketbird Pacer Fees	\$18.27	Docketbird Pacer Fees
03/13/2018	2018/03/13, Legal Research-Docketbird Pacer Fees	\$18.07	Docketbird Pacer Fees

03/15/2018	Mediation Fees	\$850.00	Phillips ADR Enterprises, Inc.
03/31/2018	WestLaw	\$12.97	Westlaw
03/31/2018	WestLaw	\$5.67	Westlaw
3/13/2019	Mediation Fee	\$850.00	Phillips ADR Enterprises, Inc.
		<b>TOTAL \$</b>	<b>20,764.06</b>